

EXHIBIT “B”

Linda Wood

From: Kristine Snyder <ksnyder@fainmajor.com>
Sent: Friday, August 4, 2023 11:58 AM
To: Linda Wood
Cc: Samuel Sabulis; Olivia Still
Subject: RE: Progressive v. Robert Radcliff, et al, U.S. District Court of Georgia, Northern District, CAFN: 1:23-cv-02322-JPB

Hi Linda,

Thanks for getting in touch. I have tried many, many times to reach Mr. Radcliff about the various suits with no success. I have not been in contact with him at any point in my representation of him. I cannot accept service on anyone's behalf without their permission, and without explaining to them the pros and cons of same. Additionally, without representing him in this particular suit, I wouldn't be authorized to accept service on his behalf in this particular suit. Along those lines, are you aware of anyone who does represent him in this action?

I will, however, continue my attempts to reach him. If I succeed, I will let you know, and I will certainly explain the waiver of service to him and see if he would be agreeable to that.

Thanks,
Kristie

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From: Linda Wood <LWood@luederlaw.com>
Sent: Friday, August 4, 2023 11:35 AM

To: Kristine Snyder <ksnyder@fainmajor.com>

Cc: Samuel Sabulis <SSabulis@luederlaw.com>

Subject: Progressive v. Robert Radcliff, et al, U.S. District Court of Georgia, Northern District, CAFN: 1:23-cv-02322-JPB

Good morning, Ms. Snyder,

We represent Progressive Mountain Insurance Company in the above-captioned matter, as well as in the current litigation pending from Margaret Melzer. The above-captioned matter was filed in the United States District Court of Georgia, Northern District on May 24, 2023, and names your client, Robert Radcliff, as a Respondent. While we realize that you do not represent Mr. Radcliff in this action, we have attempted to issue process of service against him which has been unfruitful. As such, we were hoping that you would be willing to either accept service on Mr. Radcliff's behalf or assist us in contacting Mr. Radcliff for the purpose of him accepting service of the Summons and Petition through your office by signing a Waiver of Service individually. We have taken the liberty of attaching two (2) separate Waivers for this purpose, as well as the Notices of Lawsuit, Summons and Petition. If you are willing to assist us in this matter, we will mail the hard copies of everything to your office according to law.

Thank you in advance for your consideration in this matter. Any assistance you could provide would be greatly appreciated.

Thanks so much,



Linda Wood

Paralegal

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